

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Revision of the Commission's Rules	)	CC Docket No. 94-102
to Ensure Compatibility with Enhanced	)	
E911 Emergency Calling Systems	)	
	)	

To: The Wireless Telecommunications Bureau

**Carrier Report of CGKC&H No. 2 Rural Cellular Limited Partnership Regarding  
Implementation of Wireless E911 Phase II Automatic Location Identification**

In response to the telephone request of Pat Forster of the Federal Communications Commission's ("FCC" or "Commission") Wireless Telecommunications Bureau, CGKC&H No. 2 Rural Cellular Limited Partnership ("CGKC&H") hereby submits a report regarding implementation of wireless E911 Phase II Automatic Location Identification ("ALI").

**I. Background / Contact Information**

CGKC&H serves rural Texas and its contact information is as follows:

Griff Griffin  
Systems Engineer

CGKC&H No. 2 Rural Cellular Limited Partnership (TRS # 809455)  
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**II. E911 Phase II Location Technology Information**

CGKC&H has chosen to pursue a hybrid (handset-based and network-based) technology solution to achieve ALI compliance.<sup>1</sup> CGKC&H intends to deploy a hybrid solution throughout its service area.

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<sup>1</sup> CGKC&H has been researching many different Phase II vendors and their potential product offerings. These companies include Nortel, Snap Track, SCC Communications,

### **III. Testing and Verification**

CGKC&H has yet to test any ALI solutions since it is still examining available products. In addition, CGKC&H has not been able to test any handsets since none are available and CGKC&H has yet to be given a date when ALI-capable handsets will be available. CGKC&H anticipates using a combination of Empirical Testing Methods and Predictive Testing Methods to gauge the accuracy of its hybrid technology solution.

### **IV. Implementation Details and Schedule**

While CGKC&H is awaiting product availability, it has developed a tentative implementation schedule to meet both the FCC's handset-based rules and network-based rules. CHKC&H will begin selling ALI-capable handsets on October 1, 2001 as the FCC's rules require. CGKC&H will continue to evaluate network-based ALI solutions as part of its hybrid solution and intends to select and deploy a network technology after the first quarter of 2001. CGKC&H will accelerate this schedule to the extent necessary upon receipt of a PSAP request.

### **V. PSAP Interface**

CGKC&H has yet to receive a Phase II PSAP request. Most of the PSAP interface details will depend upon the specific requests of the PSAP.

### **VI. Handset Information**

CGKC&H will run promotions in order to replace existing handsets. The price of the new ALI-capable handsets, unavailable at this time, will affect CGKC&H's replacement strategy.

February 20, 2001